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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 12-0199 EMC
14 Plaintiff,) STIPULATION AND [PROPOSED]
15 v.) ORDER EXCLUDING TIME UNDER
16 CALVIN LAWRENCE,) THE SPEEDY TRIAL ACT, 18 U.S.C. §
17 Defendant.) 3161 ET SEQ.
18

19 Plaintiff United States of America, by and through its attorney of record, and defendant
20 Calvin Lawrence (“defendant”), by and through his attorney of record, hereby stipulate as follows:

21 1. On May 16, 2012, defendant appeared before the Honorable Edward M. Chen,
22 United States District Judge, and the matter was continued to May 30, 2012 at 2:30 p.m. For the
23 reasons stated in open court on May 16, 2012, and with defendant’s consent, the Court excluded
24 time under the Speedy Trial Act from May 16, 2012 through May 30, 2012 to provide the defense
25 lawyer with additional time for investigation and for effective preparation.

26 3. The parties stipulate and agree that this matter should be continued to May 30, 2012
27 at 2:30 p.m. and that the failure to grant such a continuance would unreasonably deny counsel the
28

1 reasonable time necessary for effective preparation, taking into account the exercise of due
2 diligence. The parties further stipulate and agree that the time from May 16, 2012 through May 30,
3 2012 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §
4 3161(h)(7)(A), on the basis that the ends of justice are served by taking such action which outweigh
5 the best interest of the public and the defendant in a speedy trial and also under subsection (B)(iv)
6 for effective preparation of counsel, taking into account the exercise of due diligence.

7 Dated: May 17, 2012

Respectfully submitted,

9 MELINDA HAAG
United States Attorney

10 /s/
11 DEBORAH R. DOUGLAS
Assistant United States Attorney

12 Dated: May 17, 2012

13 /s/
14 ELIZABETH FALK
Assistant Federal Public Defender
15 Attorney for Defendant Calvin Lawrence

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 12-0199 EMC
14 Plaintiff,) ORDER EXCLUDING TIME UNDER THE
15 v.) SPEEDY TRIAL ACT, 18 U.S.C. § 3161 ET
16 CALVIN LAWRENCE,) SEQ.
17 Defendant.)
18 _____)

19 GOOD CAUSE APPEARING, as the Court found on May 16, 2012, and based upon the
20 parties' stipulation, IT IS HEREBY ORDERED that the time from May 16, 2012 through May 30,
21 2012 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C.
22 §§ 3161(h)(7)(A) and (B)(iv), to provide the defense lawyer with additional time for investigation
23 and for effective preparation. The Court finds that (A) failure to grant the continuance would
24 unreasonably deny defendant the reasonable time necessary for effective preparation, taking into
25 account the exercise of due diligence; and (B) the ends of justice served by the continuance

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CR 12-0199 EMC

1 outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C.
2 § 3161(h)(1)(7)(A) & (B)(iv).

3
4 **IT IS SO ORDERED.**

5 18
6 Dated: May ___, 2012

